

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

BAQUAN SLEDGE, a/k/a RELL,
a/k/a TJ, a/k/a MATTHEW PIERCE;
DARIUS SLEDGE, a/k/a ACE,
a/k/a MAN MAN, a/k/a FRANK,
a/k/a FRANK LOVE, a/k/a GARY,
a/k/a BILL; DONDIAGO JONES,
a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II,
a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a
TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITIY
SMITH, a/k/a LET LET, a/k/a LELE;
TWN STEPFONE BOYD,
a/k/a YO BOY, a/k/a D;
IRA MAE SNELL;
GRAYSON DYE;
MARTINA WHITETAIL, a/k/a TINA
WHITETAIL;
ROBERT TOUCHE;
CALVIN DUBOIS;
EDWARD DUBOIS, a/k/a BABY D;
CHANTEL LONGIE;
KERRY MORIN;
KASANDRA GRANT, a/k/a KASSIE;
CONSTANCE AIKEN; and
SHANAE DUBOIS

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 922(g)(1),
924(a)(2), 924(c)(1)(A), 924(d), 1956(h),
and 2; 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), 846, 853, and 856; and
28 U.S.C. 2461(c)

COUNT ONE

**Conspiracy to Distribute and Possess with Intent to Distribute
A Controlled Substance**

The Grand Jury Charges:

From in or about 2015 and continuing through the date of this Indictment, in the District of North Dakota, and elsewhere,

BAQUAN SLEDGE, a/k/a RELL, a/k/a TJ, a/k/a MATTHEW PIERCE;
DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITY SMITH, a/k/a LET LET, a/k/a LELE;
TWON STEPFONE BOYD, a/k/a YO BOY;
IRA MAE SNELL;
GRAYSON DYE,
MARTINA WHITETAIL, a/k/a TINA WHITETAIL;
ROBERT TOUCHE;
CALVIN DUBOIS;
EDWARD DUBOIS, a/k/a BABY D;
CHANTEL LONGIE;
KERRY MORIN;
KASANDRA GRANT, a/k/a KASSIE;
CONSTANCE AIKEN; and
SHANAE DUBOIS

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute and possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in or near the Turtle Mountain Indian Reservation, Spirit Lake Indian Reservation, and Fort Berthold Indian Reservation, North Dakota, and elsewhere, including but not limited to the following:

- a. On or about January 24, 2017, BAQUAN SLEDGE, a/k/a REL, a/k/a TJ, a/k/a MATTHEW PIERCE, individually, and by aiding and abetting, distributed approximately five pills containing a detectable amount of oxycodone in Ward County, North Dakota;
- b. On or about July 26, 2019, DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT, and KASANDRA GRANT, a/k/a KASSIE, individually, and by aiding and abetting, distributed approximately 30 pills containing a detectable amount of oxycodone in Rolette County, North Dakota;
- c. On or about August 21, 2019, DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE, a/k/a GARY, a/k/a BILL, possessed with intent to distribute approximately 30 pills containing a detectable amount of oxycodone on or near the Turtle Mountain Indian Reservation in Rolette County, North Dakota;
- d. On or about October 18, 2019, TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.; DEANTE EDWARDS, a/k/a TAY; ANTHONY WADE, a/k/a BLUE; CALVIN DUBOIS;

EDWARD DUBOIS, a/k/a BABY D; and CHANTEL LONGIE, individually, and by aiding and abetting, possessed with intent to distribute approximately 230 pills containing a detectable amount of oxycodone on or near the Turtle Mountain Indian Reservation in Rolette County, North Dakota;

- e. On or about November 3, 2019, DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT; and IRA MAE SNELL, individually, and by aiding and abetting, possessed with intent to distribute approximately 43 pills containing a detectable amount of oxycodone on or near the Spirit Lake Indian Reservation in Benson County, North Dakota;

2. It was further a part of said conspiracy that certain conspirators sought and located users of oxycodone to purchase controlled substances from other conspirators;

3. It was further a part of said conspiracy that certain conspirators sought and located sub-distributors of oxycodone for other conspirators;

4. It was further a part of said conspiracy that one or more conspirators possessed firearms to protect their supply of controlled substances and their drug trafficking activity in North Dakota and elsewhere;

- a. On or about June 19, 2019, DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT, possessed one Diamondback Firearm, Model DB15PCB7, AR-15 Semi-Automatic pistol, Serial Number DB1918287, and one Glock USA, Model 43, 9mm pistol, Serial Number ADFE986, on or

near the Fort Berthold Indian Reservation in McKenzie County, North Dakota;

- b. On or about August 8, 2019, TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR., possessed one Ruger, Model P90, .45 caliber pistol, Serial Number 660-29995, on or near the Turtle Mountain Indian Reservation in Rolette County, North Dakota;
- c. On or about October 18, 2019, TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR., possessed one Sig Sauer, Model P365, 9mm caliber pistol, Serial Number 66A021442, and one Mossberg, Model 500C, 20 gauge shotgun with pistol grip, Serial Number L219959, on or near the Turtle Mountain Indian Reservation in Rolette County, North Dakota;
- d. On or about October 18, 2019, ANTHONY WADE, a/k/a BLUE, possessed one Smith & Wesson, Model M&P Bodyguard, 380 caliber pistol, Serial Number KBP3731, on or near the Turtle Mountain Indian Reservation in Rolette County, North Dakota;
- e. On or about November 5, 2019, DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK, possessed one Savage Arms, Model Mark II, .22 caliber rifle, Serial Number 2112032, on or near the Turtle Mountain Indian Reservation in Bottineau County, North Dakota;

5. It was further a part of said conspiracy that one or more conspirators received money wire transfers that were proceeds of oxycodone sales;

6. It was further a part of said conspiracy that one or more conspirators sent money wire transfers that were proceeds of oxycodone sales;

7. It was further a part of said conspiracy that one or more conspirators traveled between the states of Michigan and North Dakota, and elsewhere, to obtain, transport, and distribute oxycodone;

8. It was further a part of said conspiracy that one or more conspirators acquired automobiles, including rental cars, to transport and distribute oxycodone in North Dakota, and elsewhere;

9. It was further a part of said conspiracy that one or more conspirators rented and occupied apartments and hotel rooms in North Dakota, and elsewhere, from which to store, possess, and distribute oxycodone;

10. It was further a part of said conspiracy that DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE, a/k/a GARY, a/k/a BILL; DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK; DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT; TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.; DEANTE EDWARDS, a/k/a TAY; ANTHONY WADE, a/k/a BLUE; LILLIAN LEE, a/k/a CHASITIY SMITH, a/k/a LET LET, a/k/a LELE; TWON STEPFONE BOYD, a/k/a YO BOY, a/k/a D; CALVIN DUBOIS; KERRY MORIN; CONSTANCE AIKEN, and others, did occupy houses on or near the Turtle Mountain Indian Reservation in North Dakota, and elsewhere, from which to store, possess, and distribute oxycodone, a Schedule II controlled substance;

11. It was further a part of said conspiracy that BAQUAN SLEDGE, a/k/a RELL, a/k/a TJ, a/k/a MATTHEW PIERCE; DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK; DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT; IRA MAE SNELL; GRAYSON DYE; MARTINA WHITETAIL, a/k/a TINA WHITETAIL; ROBERT TOUCHE, and others, did occupy houses on or near the Spirit Lake Indian Reservation in North Dakota, and elsewhere, from which to store, possess, and distribute oxycodone, a Schedule II controlled substance;

12. It was further a part of said conspiracy that one or more conspirators collected money from other persons to purchase pills containing oxycodone;

13. It was further a part of said conspiracy that one or more conspirators would and did attempt to conceal their activities;

14. It was further a part of said conspiracy that one or more conspirators would and did use United States currency in their drug transactions; and

15. It was further a part of said conspiracy that one or more conspirators would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of oxycodone;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Money Laundering Conspiracy

The Grand Jury Further Charges:

From in or about 2015 and continuing through the date of this Indictment, in the District of North Dakota, and elsewhere,

BAQUAN SLEDGE, a/k/a REL, a/k/a TJ, a/k/a MATTHEW PIERCE;
DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II a/k/a COUNTRY a/k/a KUNT,
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITIY SMITH, a/k/a LET LET, a/k/a LELE;
EDWARD DUBOIS, a/k/a BABY D;
and SHANAE DUBOIS

did knowingly combine, conspire, and agree with one or more persons, both known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 18, United States Code, Section 1956(h), to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, knowingly and intentionally distributing controlled substances: (a) with intent to promote the carrying on of the specified unlawful activity; and (b) knowing that the transaction is designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i);

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. BAQUAN SLEDGE, a/k/a RELLE, a/k/a TJ, a/k/a MATTHEW PIERCE; DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE, a/k/a GARY, a/k/a BILL; DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK; DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT; TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.; ANTHONY WADE, a/k/a BLUE; LILLIAN LEE, a/k/a CHASITIY SMITH, a/k/a LET LET, a/k/a LELE; EDWARD DUBOIS, a/k/a BABY D; SHANAE DUBOIS, and co-conspirators, acquired oxycodone, a Schedule II controlled substance, outside of the District of North Dakota for distribution. The oxycodone was thereafter transported through, and distributed in, the District of North Dakota, and elsewhere, during the time frame of the conspiracy;

2. Members of the controlled substance distribution conspiracy organization would sell oxycodone, and currency would be collected and transferred from one person to another to continue the ongoing illegal activity; and

3. During the course of this conspiracy, persons both known and unknown to the Grand Jury, utilized money transfer services, such as Walmart-to-Walmart (RFI Financial) and MoneyGram money services, to wire and transfer proceeds of the illegal drug sales from North Dakota to Michigan, and elsewhere, with intent to disguise and conceal the nature, the location, the source, the ownership, and the control of the

proceeds of the drug trafficking activity, and to promote and continue the distribution activity;

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

On or about January 24, 2017, in the District of North Dakota,

BAQUAN SLEDGE, a/k/a RELLE, a/k/a TJ, a/k/a MATTHEW PIERCE,
individually, and by aiding and abetting, knowingly and intentionally possessed with
intent to distribute approximately five pills of a mixture and substance containing a
detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT FOUR

Maintaining a Drug-Involved Premise

The Grand Jury Further Charges:

From in or about 2018 and continuing through the date of this Indictment, in the District of North Dakota, and elsewhere,

DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITIY SMITH, a/k/a LET LET, a/k/a LELE;
and CALVIN DUBOIS

knowingly opened, leased, rented, used, and maintained any place, whether permanently or temporarily, specifically, a residence on or near the Turtle Mountain Indian Reservation in North Dakota, for the purpose of distributing and using oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 856, and Title 18, United States Code, Section 2.

COUNT FIVE

Possession of Firearms by a Convicted Felon

The Grand Jury Further Charges:

In or about June 2019, in the District of North Dakota,

DERRICK WALKER, II a/k/a COUNTRY, a/k/a KUNT,

knowing that he had previously been convicted in any court of the following crime punishable by imprisonment for a term exceeding one year, that is:

- Criminal Mischief, a Class C Felony, on or about February 7, 2019, in Montrail County, North Central Judicial District, North Dakota, Case Number 31-2019-CR-00028,

did knowingly possess in and affecting commerce a firearm, that is:

- One Diamondback Firearm, Model DB15PCB7, AR-15 Semi-Automatic pistol, Serial Number DB1918287; and
- One Glock USA, Model 43, 9mm pistol, Serial Number ADFE986;

In violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT SIX

Distribution of Oxycodone

The Grand Jury Further Charges:

In or about July 2019, in the District of North Dakota,

DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
and KASANDRA GRANT, a/k/a KASSIE,

individually, and by aiding and abetting, knowingly and intentionally distributed approximately 30 pills of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

In or about August 2019, in the District of North Dakota,

DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL,

individually, and by aiding and abetting, knowingly and intentionally possessed with
intent to distribute approximately 30 pills of a mixture and substance containing a
detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C),
and Title 18, United States Code, Section 2.

COUNT EIGHT

Maintaining a Drug-Involved Premise

The Grand Jury Further Charges:

From in or about August 2019 and continuing through the date of this Indictment,
in the District of North Dakota, and elsewhere,

BAQUAN SLEDGE, a/k/a RELLE, a/k/a TJ, a/k/a MATTHEW PIERCE;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
and IRA MAE SNELL,

knowingly opened, leased, rented, used, and maintained any place, whether permanently
or temporarily, specifically, a residence on or near the Spirit Lake Indian Reservation in
North Dakota, for the purpose of distributing and using oxycodone, a Schedule II
controlled substance;

In violation of Title 21, United States Code, Section 856, and Title 18, United
States Code, Section 2.

COUNT NINE

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

In or about October 2019, in the District of North Dakota,

TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
CALVIN DUBOIS;
EDWARD DUBOIS, a/k/a BABY D;
and CHANTEL LONGIE,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 230 pills of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

Possession of Firearms in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

In or about October 2019, in the District of North Dakota,

TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.,

possessed firearms, namely:

- One Sig Sauer, Model P365, 9mm caliber pistol, Serial Number 66A021442;
and
- One Mossberg, Model 500C, 20 gauge shotgun with pistol grip, Serial Number L219959;

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substances, as set forth in Count One of this Indictment, and Possession with Intent to Distribute Oxycodone, as set forth in Count Nine of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT ELEVEN

Possession of Firearms by a Convicted Felon

The Grand Jury Further Charges:

In or about October 2019, in the District of North Dakota,

TERRENCE JOHNSON, a/k/a T, TERRANCE PRESS JOHNSON JR.,

knowing that he had previously been convicted in any court of the following crime punishable by imprisonment for a term exceeding one year, that is:

- Trafficking in a Controlled Substance in the First Degree, in violation of Ky. Rev. Stat. § 218A.1412, a Class C felony, in Boone Circuit Court, Commonwealth of Kentucky, case number 15-CR-341, judgment entered on or about August 24, 2015,

did knowingly possess in and affecting commerce a firearm, that is:

- One Sig Sauer, Model P365, 9mm caliber pistol, Serial Number 66A021442;
and
- One Mossberg, Model 500C, 20 gauge shotgun with pistol grip, Serial Number L219959;

In violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT TWELVE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

In or about October 2019, in the District of North Dakota,

ANTHONY WADE, a/k/a BLUE,

possessed a firearm, namely:

- One Smith & Wesson, Model M&P Bodyguard, 380 caliber pistol, Serial Number KBP3731;

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substances, as set forth in Count One of this Indictment, and Possession with Intent to Distribute Oxycodone, as set forth in Count Nine of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT THIRTEEN

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

In or about November 2019, in the District of North Dakota,

DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
and IRA MAE SNELL,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 43 pills of a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION - ONE

The Grand Jury Further Finds Probable Cause That:

As a result of committing one or more of the controlled substance offenses alleged in this Indictment, defendants:

BAQUAN SLEDGE, a/k/a RELL, a/k/a TJ, a/k/a MATTHEW PIERCE;
DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITIY SMITH, a/k/a LET LET, a/k/a LELE;
TWON STEPFONE BOYD, a/k/a YO BOY;
IRA MAE SNELL;
GRAYSON DYE,
MARTINA WHITETAIL, a/k/a TINA WHITETAIL;
ROBERT TOUCHE;
CALVIN DUBOIS;
EDWARD DUBOIS, a/k/a BABY D;
CHANTEL LONGIE;
KERRY MORIN;
KASANDRA GRANT, a/k/a KASSIE;
CONSTANCE AIKEN; and
SHANAE DUBOIS

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in this Indictment, including, but not limited to, the following: A sum of money equal to \$21,781.00 in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in this Indictment.

Further, the United States will seek a money judgment for the total amount of proceeds. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of defendants,

BAQUAN SLEDGE, a/k/a RELLE, a/k/a TJ, a/k/a MATTHEW PIERCE;
DARIUS SLEDGE, a/k/a ACE, a/k/a MAN MAN, a/k/a FRANK, a/k/a FRANK LOVE,
a/k/a GARY, a/k/a BILL;
DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY;
ANTHONY WADE, a/k/a BLUE;
LILLIAN LEE, a/k/a CHASITY SMITH, a/k/a LET LET, a/k/a LELE;
TWOON STEPFONE BOYD, a/k/a YO BOY;
IRA MAE SNELL;
GRAYSON DYE,
MARTINA WHITETAIL, a/k/a TINA WHITETAIL;
ROBERT TOUCHE;
CALVIN DUBOIS;
EDWARD DUBOIS, a/k/a BABY D;
CHANTEL LONGIE;
KERRY MORIN;
KASANDRA GRANT, a/k/a KASSIE;
CONSTANCE AIKEN; and
SHANAE DUBOIS

up to the value of the above-listed forfeitable property;

In violation of Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION - TWO

The Grand Jury Further Finds Probable Cause That:

Upon conviction of the offense alleged in this Indictment,

DONDIAGO JONES, a/k/a AGO, a/k/a DONDI, a/k/a FRANK;
DERRICK WALKER II, a/k/a COUNTRY, a/k/a KUNT;
TERRENCE JOHNSON, a/k/a T, a/k/a TERRANCE PRESS JOHNSON JR.;
DEANTE EDWARDS, a/k/a TAY; and
ANTHONY WADE, a/k/a BLUE;

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to:

- One Diamondback Firearms, Model DB15PCB7, AR-15 Semi-Automatic pistol, Serial Number DB1918287;
- One Glock USA, Model 43, 9mm pistol, Serial Number ADFE986;
- One Ruger, Model P90, .45 caliber pistol, Serial Number 660-29995;
- One Sig Sauer, Model P365, 9mm caliber pistol, Serial Number 66A021442;
- One Mossberg, Model 500C, 20 gauge shotgun with pistol grip, Serial Number L219959;
- One Smith and Wesson, Model M&P Bodyguard, 380 caliber pistol, Serial Number KBP3731;
- One Savage Arms, Model Mark II, .22 caliber rifle, Serial Number: 2112032.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Nicholas W. Chase for

DREW H. WRIGLEY

United States Attorney

DMD/LC/vt